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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM - 8012

In the matter of)
)
Policies and Rules)
Pertaining to)
the Equal Access Obligations)
of Cellular Licensees)
)

COMMENTS OF SPRINT

Sprint Communications Company L.P. ("Sprint") herein offers its Comments in response to the Petition for Rulemaking filed by MCI Telecommunications Corporation ("MCI") on June 2, 1992.

MCI requests that the Commission initiate a rulemaking proceeding to require all cellular licensees to interconnect with interexchange carriers via "uniform, nationwide cellular equal access policies and procedures" (MCI Petition for Rulemaking at 1). Sprint supports initiation of a rulemaking proceeding in which the Commission can evaluate the complex legal and technical issues presented.

The process for phased-in equal access to the interconnection facilities of the Bell Operating Companies ("BOCs") was established in the U.S. District Court's ("Court's") judgement affirming the proposed antitrust consent decree, U.S. v. Western Electric, 552 F. Supp. 131 (1982) at 232 (Appendix B). The Court has explained that "[t]he requirement that equal access be provided to all interexchange carriers is one of the key components of the

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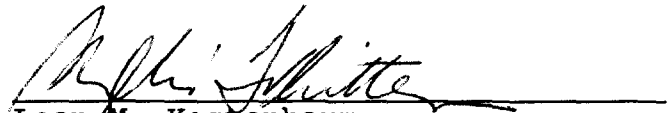
decree," U.S. v. Western Electric Company, 698 F.Supp 348, 368 (1988).

The equal access implementation process has been a fundamental precondition to development of competition in the interexchange market. Sprint owes much of its success in the market to the equal access requirement and is keenly aware of its importance.

It is Sprint's position that equal access should be required for cellular unless there are practical or technological impediments which would render such requirement contrary to the public interest. The Commission may determine that cellular equal access may have to be "phased-in" over a period of several years, that cellular equal access cannot be implemented ubiquitously at the present time, or event that cellular equal access implementation should be delayed in its entirety. However, these issues, no matter what their resolution, do not militate against MCI's proposed rulemaking. Plainly, MCI has shown enough so that such rulemaking should go forward.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.


Leon M. Kestenbaum
Phyllis A. Whitten
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
(202) 857-1030

Its Attorneys

September 2, 1992

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Sprint" was sent by United States first-class mail, postage prepaid, on this the 2nd day of September, 1992, to the below-listed parties:

Stephen M. Shapiro
Mayer, Brown & Platt
190 South LaSalle Street
Chicago, IL 60603

Michael K. Kellogg
Mayer, Brown & Platt
2000 Pennsylvania Ave., N.W.
Washington, D.C. 20006
Counsel for the Regional
Bell Companies

Thomas P. Hester
Alan N. Baker
Ameritech
30 South Wacker Drive
Chicago, IL 60606

William B. Barfield
Charles P. Featherstun
BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, GA 30367

Raymond F. Burke
Gerald E. Murray
Edward R. Wholl
NYNEX Corporation
1113 Westchester Avenue
White Plains, NY 10604

Richard W. Odgers
Randall E. Cape
Kristin A. Ohlson
130 Kearny Street
Suite 3651
San Francisco, CA 94108

Charles P. Russ
Stuart S. Gunckel
Joseph C. O'Neil
U S West, Inc.
7800 East Orchard Road
Englewood, CO 80111

James L. Wurtz
Pacific Telesis Group
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

John Cimko, Jr., Chief*
Mobile Services Division
Federal Communications
Commission
1919 M Street, N.W.
Room 644 (1600D)
Washington, D.C. 20554

Steve Markendorff*
Mobile Services Division
Federal Communications
Commission
1919 M Street, N.W.
Room 644 (1600D3)
Washington, D.C. 20554

Larry A. Blosser
Donald J. Elardo
MCI Telecommunications Corp.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Michael Mandigo*
Common Carrier Bureau
Federal Communications
Commission
1919 M Street, N.W.
Washington, D.C. 20554

Mark R. Hamilton
McCaw Cellular
Communications, Inc.
5400 Carillon Point
Kirkland, WA 98033

Peter Arth, Jr.
Edward W. O'Neill
Helen M. Mickiewicz
505 Van Ness Avenue
San Francisco, CA 94102
Attorney for the Public
Utilities Commission People
of the State of California
and the PUC of California

Wayne Watts
Linda Hood
Southwestern Bell Mobile
Systems, Inc.
17330 Preston Rd., Suite 100A
Dallas, TX 75252

Downtown Copy Center*
1919 M Street, N.W.
Room 246
Washington, D.C. 20554

James D. Ellis
William J. Free
Mark P. Royer
Southwestern Bell Corp.
One Bell Center, RM 3512
St. Louis, MO 63101-3099


Christine Jackson

September 2, 1992

* BY HAND